

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop Additional
Methods to Implement the California Renewables
Portfolio Standard Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

**COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS
AND THE WESTERN POWER TRADING FORUM
ON THE PROPOSED DECISION OF ALJ SIMON**

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In accordance with Article 15 of the Commission's Rules of Practice and Procedure, the Alliance for Retail Energy Markets ("AReM")¹ and the Western Power Trading Forum ("WPTF")² respectfully submit to the California Public Utilities Commission ("Commission") these joint comments on the Proposed Decision ("PD") of Administrative Law Judge ("ALJ") Anne E. Simon issued on March 26, 2009, entitled *Decision Authorizing Use of Renewable Energy Credits for Compliance With the Renewables Portfolio Standard*.

I. INTRODUCTION

The PD authorizes the use of tradable renewable energy credits ("TRECs") for compliance with the Renewables Portfolio Standard ("RPS") and makes corresponding enhancements to the Commission's RPS program implementation rules, long-awaited developments which AReM and WPTF sincerely welcome. AReM and WPTF concur with the

¹ AReM is a California mutual benefit corporation formed by electric service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM and its members but not necessarily the affiliates of its members with respect to the issues addressed herein.

² WPTF is a California non-profit, mutual benefit corporation. It is a broadly based membership organization dedicated to enhancing competition in Western electric markets in order to reduce the cost of electricity to consumers throughout the region while maintaining the current high level of system reliability. WPTF actions are

PD's conclusion that the benefits that will follow from allowing RPS-obligated load-serving entities ("LSEs") to use TRECs for RPS compliance "substantially outweigh the potential harms." AReM and WPTF therefore urge the Commission to adopt the PD, with the minor clarifications and additions discussed herein, at the earliest opportunity.

The PD supplants the PD of ALJ Simon issued on October 29, 2008, and withdrawn on March 26, 2009. From the perspective of AReM and WPTF, the most notable difference between the two PDs is that the current PD imposes a temporary cap on the amount of TRECs that certain load-serving entities ("LSE") may count toward their RPS obligations in a given year. Specifically, the PD temporarily limits the use of TRECs by the large investor-owned utilities ("IOUs") and, in certain circumstances, multi-jurisdictional utilities ("MJUs") to five percent (5%) of their Annual Procurement Targets ("APTs"). (The proposed TREC usage limit does not apply to electric service providers ("ESPs"), community choice aggregators ("CCAs") and small utilities.)

AReM and WPTF oppose, as a matter of principle, the imposition of artificial constraints on the RPS compliance market and, as a practical matter, are concerned that the PD's limit on TREC usage will hamper the development of a robust TREC market and could inadvertently reduce the amount of new RPS-eligible resources that otherwise might be developed in the next several years. AReM and WPTF therefore do not support the PD's adoption of a TREC usage limit for the IOUs and MJUs. (AReM and WPTF appreciate, however, the PD's recognition that it would not be appropriate to impose a TREC usage limit on ESPs.) Additionally, AReM and WPTF support, or do not oppose, the following elements of the PD:

focused on supporting development of competitive electricity markets throughout the region and developing uniform operating rules to facilitate transactions among market participants.

- TRECs must be tracked and retired within the Western Renewable Energy Generation Information System (“WREGIS”) in order to be counted toward an LSE’s RPS obligations.
- To be eligible to be counted toward an LSE’s RPS obligations, TRECs must be retired in the LSE’s WREGIS accounts in which they are recorded within three years of their creation (inclusive of the year of their creation).
- Once an LSE has “retired” TRECs in the appropriate WREGIS accounts, the LSE may bank the TRECs for use in future years in accordance with the Commission’s flexible compliance rules.
- RECs from bundled contracts currently delivering RPS-eligible energy may be unbundled and traded separately from the associated energy.
- As a general rule, RECs from bundled contracts scheduled to deliver RPS-eligible energy in the future may be unbundled and traded on a forward basis separately from the associated energy.

AReM and WPTF request, however, that certain elements of the PD are unwarranted or should be clarified. For this reason, AReM and WPTF recommend that the PD be modified to clarify that:

1. LSEs will report TREC transactions as part of their semi-annual RPS compliance reports, rather than in a separate report; and
2. ESPs are not required to report TREC prices.

Finally, AReM and WPTF recommend that the Commission’s final decision provide for a workshop to be convened as soon as possible to develop any changes to the RPS reporting spreadsheets and protocols that may be necessary to ensure consistency with WREGIS rules and protocols.

II. COMMENTS

A. The PD's Proposed TREC Usage Limit Could Undermine the Development of a Robust TREC Market and Discourage Development of New Renewable Generation Resources.

AReM and WPTF are concerned that the PD's imposition of even a temporary limit on the IOUs' and MJUs' use of TRECs for RPS compliance could undermine the development of a robust TREC market and new renewable development. The PD correctly observes, "It is true that TRECs can expand RPS compliance options, but without new RPS-eligible generation, a robust TREC market to deliver TRECs for RPS compliance will not develop quickly."³ Ironically, imposition of the PD's proposed usage limit on the IOUs could make the foregoing a self-fulfilling prophecy.

As stated in the PD, among the Commission's goals in developing the rules governing the use of TRECs for RPS compliance are allowing "the best chance for a healthy TREC market to develop,"⁴ including rules that "promote market liquidity."⁵ Furthermore, as the PD correctly recognizes:

The availability of a revenue stream from TRECs may encourage new renewable development. Though many other factors, such as transmission siting, are also important determinants of new renewable development, the possibility of more money, or money arranged more flexibly, is only a plus for possible development. Furthermore, a TREC market will provide important pricing information to developers and the investment community, potentially providing them greater confidence in the long-term financial viability of renewable energy projects.⁶

However, the proposed TREC usage limit, coupled with the PD's proposed re-categorization of certain forms of currently allowed "bundled" transactions for RECs and energy from out-of-state

³ PD, pp. 13-14.

⁴ PD, p. 15.

⁵ PD, p. 2.

sources as “REC-only” transactions, could artificially reduce both the size and the liquidity of the TREC market.

To the extent RECs purchased from out-of-state sources in what were formerly categorized as “bundled” transactions will now be counted toward the TERC usage limit, it will reduce the amount of TRECs that the IOUs and MJUs might otherwise be in the market for, thereby reducing the overall demand for TRECs. As the demand for TRECs is artificially reduced, so will be the potentially available revenue streams from the sale of TRECs. As a result, new renewable development that otherwise might be encouraged – by the potential of revenue streams from the sale of TRECs and the price signals provided by a liquid TREC market – could fail to materialize. (This outcome is particularly likely with respect to new projects located in transmission-constrained areas within California and those located out of state whose financing is dependent on the potential availability of a revenue stream from sales of TRECs to California LSEs.) Thus, the imposition of a TREC usage limit on the IOUs, even on a temporary basis, could perversely result in less new renewable development overall and therefore fewer TRECs and less flexible compliance options for all LSEs.

AReM and WPTF appreciate ALJ Simon’s concern that “ratepayers should not have to bear the risks associated with the fact that TREC contracts, unlike bundled RPS contracts, will not provide long-term fixed price energy for utility customers.”⁷ However, the underlying concern here – that IOU ratepayers will end up paying more for RPS compliance as a result of increased price volatility – would seem to be addressed adequately by the PD’s imposition of a \$50/MWh cap on the price of TRECs paid by the IOUs. Furthermore, while well intentioned, the PD actually removes options for managing the costs of RPS compliance at the potential

⁶ PD, p. 14.

expense of consumers. To the extent that IOUs perceive a need to hedge energy prices they are free to enter energy transactions, either separately or as a bundled REC transaction, to mitigate that risk. The PD, however, essentially *requires* the bundled transactions (once the TREC usage limit has been reached) regardless of whether that is the overall least cost procurement and RPS compliance approach.

The PD strives to support the idea that TRECs should be limited because one of the fundamental premises of the RPS was to provide greater energy price stability. The PD suggests that allowing TRECs for RPS compliance could prompt California LSEs to purchase more non-renewable power to meet their energy requirements, thereby creating more volatility in energy prices. This logic seems to presume that the underlying energy ceases to exist when the REC is unbundled. In fact, all the energy associated with the TRECs will still be produced and will still impact regional prices, as well as the “green profile” associated with the energy imported into the state and regional air quality.

For example, if a wind facility is developed out of state, and a California LSE buys just the RECs generated by that facility, it may appear that the other state benefits from the energy. But over time, the neighboring state will incur wind integration costs. This will in turn raise the cost of those RECs and create the economics for rational investment in California-located projects when those alternatives are more efficient than out of state projects. Creating artificial limits that push LSEs to in-state resources would undermine the positive impact of this economic efficiency and could drive up the cost of meeting the RPS for all CA consumers.

AReM and WPTF are concerned that the negative consequences of imposing artificial limits on TREC usage will be worsened in light of the fundamental challenges LSEs face in

⁷ PD, p. 28.

complying with California’s aggressive RPS requirements, challenges which will only be compounded under a 33% RPS requirement. One of the goals of the TREC rules, as stated in the PD, is to “improve RPS compliance options over time.”⁸ Access to region-wide TRECs is needed to ease compliance with these mandates, and consumers will also stand to benefit from lower overall RPS compliance costs resulting from a regional TREC market. To the extent that TREC usage is artificially limited, the State will undermine its best hope of cost efficient RPS compliance – competition in renewable development. AReM and WPTF note that there are already a number of requests for approval of utility-owned renewable generation projects pending before the Commission. Currently there is little or no competitive pressure on the prices for such projects. A limitation of the usage of region-wide TRECs would compound the detrimental implications of this for consumers by first reducing the means for LSEs to cost effectively comply and by secondly increasing the likelihood of utility-owned renewable generation at prices that are uncompetitive.⁹

B. The PD’s Correctly Determines That the TREC Usage Limit Should Not Apply to ESPs.

While objecting in general to imposing any limitations on TREC usage and urging the Commission to reject the PD’s proposed TREC usage limit, AReM and WPTF appreciate the PD’s recognition that it would not serve any valid purpose to impose such limitations on ESPs. Moreover, ESPs, like the small IOUs that the PD also determines should not be subject to the TREC usage limit, have more limited options than the IOUs in terms of the availability of reasonably priced RPS-eligible resources.¹⁰ Indeed, as the PD correctly observes, the IOUs

⁸ PD, p. 22.

⁹ WPTF and AReM underscore that both of PG&E’s most recent applications for approval of utility-owned renewable projects (Applications 09-02-013 and 09-02-019) seek authorization for stranded cost recovery, which in and of itself suggests that the projects’ costs are likely to be above market.

¹⁰ PD, p. 30.

“have the largest array of RPS procurement options and resources, enabling them to have greater flexibility incorporating the TREC limitation of 5% of APT into their procurement planning.”¹¹ The PD is therefore on solid ground in differentiating between the IOUs, on the one hand, and ESPs and other types of LSEs on the other, in terms of the applicability of the proposed TREC usage limit.

C. Certain Elements of the PD Should Be Clarified.

1. Reporting of TREC Transactions

The PD provides that all RPS-obligated LSEs will be required to file with Energy Division reports on TREC purchases, sales, and prices, with appropriate confidentiality protections.¹² AReM and WPTF are concerned that the PD could be interpreted as requiring the reporting of TREC transactions separately from the periodic RPS compliance reports that LSEs are already required to submit to the Energy Division. LSEs should simply report their TREC transactions as a part of their regularly filed RPS compliance reports. AReM and WPTF request that the PD be modified to clarify the Commission’s intent in this regard.

2. Reporting of TREC Price Data

AReM and WPTF request clarification of the language in the PD regarding the requirement that “all LSEs” report TREC prices.¹³ Non-utility LSEs should not be subject to the same disclosure requirement as the IOUs in this regard, as they are not subject to the Commission’s ratemaking authority and, as the Commission has previously recognized, are disciplined by the market and their customers with regard to their product pricing. Indeed, the Commission has not required non-utility LSEs to report RPS price data before, and the advent of

¹¹ PD, p. 31.

¹² PD, p. 60.

¹³ PD, p. 60.

a TREC market is no reason to make them start doing so now.¹⁴ AReM and WPTF assume therefore that the Commission does not intend to start requiring ESPs to report RPS-related price data now. Accordingly, AReM and WPTF request that the PD be modified to clarify that the requirement to report TREC prices applies only to Commission-regulated utilities.

D. A Workshop Should Be Convened Immediately to Integrate RPS Compliance Documents and Protocols With WREGIS Protocols.

The PD provides, “In order to facilitate the integration of the use of TRECs into the RPS program, this decision authorizes Energy Division staff to begin a process of revising the RPS compliance documents and reporting protocols.”¹⁵ AReM and WPTF believe that this process could be facilitated greatly by holding an implementation workshop that is focused on any revisions to the existing RPS compliance reporting spreadsheets and protocols that may be necessary to integrate WREGIS rules and protocols. A key issue that should be examined at the workshop is how to ensure that the reporting timelines that are applicable in WREGIS are appropriately reflected in the RPS compliance rules.¹⁶ Also, the workshop process should result in a set of protocols that will apply as WREGIS expands or is linked to other regional TREC trading programs. AReM and WPTF note that as this workshop process would be focused on implementation of the Commission’s final order and developing future reporting and compliance methodologies, it should not delay the ability to utilize TRECs for RPS compliance.

¹⁴ Indeed, ESPs are not required to report prices for any other compliance related purchases such as Resource Adequacy.

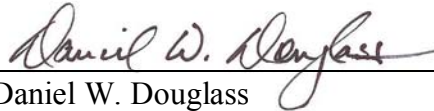
¹⁵ PD, p. 3.

¹⁶ For instance, it appears that WREGIS TREC certificates are not delivered until 90 days after the end of the generation month, which may create some issues given that RPS compliance is due in March.

III. CONCLUSION

For the reasons above, AReM and WPTF urge the Commission to adopt the PD, with the minor modifications and clarifications discussed herein, at the earliest opportunity. AReM and WPTF thank the Commission for its consideration of these comments

Respectfully submitted,



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April 15, 2009

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Comments of the Alliance for Retail Energy Markets and the Western Power Trading Forum on the Proposed Decision of ALJ Simon* on all parties of record in proceeding *R.06-02-012* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on April 15, 2009, at Arcadia, California.

-----/s/-----

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